

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

CT102 LLC d/b/a Metro Motors and H. Jeffrey Baker
Plaintiffs,

vs.

**Automotive Finance Corporation d/b/a AFC; NextGear
Capital, Inc.; Southern Auto Sales, Inc., AUTOTEC,
LLC d/b/a AUTOACCESS, LLC; Manheim, Inc. and
ADESA, Inc.,**
Defendants.

C.A. No. 1:20-cv-356-MSM-PAS

**DEFENDANTS NEXTGEAR CAPITAL, INC. AND MANHEIM, INC.’S
ASSENTED-TO MOTION TO EXTEND TIME
TO ANSWER OR OTHERWISE RESPOND TO THE FIRST AMENDED COMPLAINT**

With assent from Plaintiffs CT102 LLC d/b/a Metro Motors and H. Jeffrey Baker (“Plaintiffs”), Defendants NextGear Capital, Inc. and Manheim, Inc. (collectively “Defendants”) respectfully request an additional 30 days from September 10, 2020, up to and including **Monday, October 12, 2020**,¹ to answer or otherwise respond to Plaintiff’s First Amended Complaint. In support of this Motion, Defendants state as follows: Defendants just recently retained Rhode Island counsel who will enter her appearance contemporaneously with this assented-to motion.

By filing this assented-to motion, Defendants reserve and do not waive or relinquish any of their rights to assert any defense or affirmative matter.

WHEREFORE, the Defendants NextGear Capital, Inc. and Manheim, Inc. with assent from Plaintiffs CT102 LLC d/b/a Metro Motors and H. Jeffrey Baker respectfully request that the time to file an answer or otherwise respond to the First Amended Complaint be extended until October 12, 2020.

¹ Thirty days from September 10, 2020 is October 10, 2020, which is a Saturday. Per Fed. Civ. Pro. R. 6(a)(1)(C) the extension of time runs until end of the day on Monday, October 12, 2020.

Respectfully submitted,
DEFENDANTS
NEXTGEAR CAPITAL, INC.
and MANHEIM, INC.
by their counsel,

Dated: September 11, 2020

/s/ Katharine E. Kohm

Katharine E. Kohm (#8194)
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CERTIFICATE OF SERVICE

I certify that the foregoing document was electronically filed with the Clerk of the Court on the 11th day of September and that it is available for viewing and downloading from the Court's CM/ECF system. All counsel of record for represented parties have been served by electronic means on the date this document was filed. All parties who are self-represented or whose counsel have not yet entered an appearance have been served by U.S. Mail, first class postage prepaid, and email on the date this document was filed.

Counsel for Plaintiffs (e-filing)

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Counsel for Defendants Automotive Finance Corporation d/b/a AFC and ADESA, Inc. (e-filing)

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Defendant Southern Auto Sales, Inc. d/b/a Southern Auto Auction (U.S. Mail)

164 South Main Street
East Windsor, CT 06088

Defendant AUTOTEC, LLC d/b/a AUTOACCESS, LLC (U.S. Mail)

2200 Woodcrest Place, Suite 120,
Birmingham, AL 35209

/s/ Katharine E. Kohm